



Michael J. Geraghty
973-645-4911
mgeraghty@saiber.com

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VIA ELECTRONIC FILING

Honorable Michael A. Shipp, U.S.M.J.
Martin Luther King, Jr., Federal Building
and Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: The Port Authority of New York and New Jersey v. American Stevedoring, Inc.
Civil Action No. 09-04299 (SRC) (MAS)

Dear Magistrate Judge Shipp:

On behalf of plaintiff Port Authority of New York and New Jersey (the "Port Authority"), I write to respectfully request that the Court grant the Port Authority an additional extension of the latest date to file its motion for summary judgment from June 3, 2011 until July 8, 2011. Defendant's counsel, Janine Bauer, has graciously consented to our request.

Pursuant to the Court's letter order dated April 21, 2011, (D.E. 101), the Port Authority is permitted to file its motion for summary judgment no later than June 3, 2011. The Port Authority requests a further extension because it is required to produce additional documents to defendant American Stevedoring, Inc. ("ASI") as a result of the Court's Order dated April 12, 2011 ("Order") clarifying the Court's previous order compelling the Port Authority to produce documents responsive to ASI's document request No. 36. Since receipt of the April 12 Order, the Port Authority has been gathering and reviewing thousands of documents that may be responsive to the Request. We expected initially to have produced all responsive documents by this date. The review of numerous documents and potentially privileged documents and preparation of a privilege log, however, has delayed the Port Authority's production. Although discovery is closed, the Port Authority prefers to produce the documents that were the subject of the Order before filing its motion for summary judgment.

For the foregoing reasons, the Port Authority respectfully requests that the time for it to file a motion for summary judgment be extended until no later than July 8, 2011. If the Court grants our request, I respectfully request that it be so ordered.

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I thank the Court for its consideration in this regard.

Respectfully submitted,

/s/ Michael J. Geraghty

MICHAEL J. GERAGHTY

MJG/sab

cc: Janine G. Bauer, Esq. (via ECF)